

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DAVID SAMBRANO, individually and on	§	
behalf of all others similarly situated, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	Civil Action No. 4:21-01074-P
v.	§	
	§	
UNITED AIRLINES, INC.,	§	
	§	
Defendant.	§	

**UNOPPOSED MOTION FOR LEAVE
TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADING**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Defendant United Airlines, Inc. (“United”) files its Unopposed Motion for Leave to Extend Deadline to File Responsive Pleading and in support thereof, shows as follows:

On August 22, 2022, the Court entered an Order, among other things, for the parties to confer in-person and file a Joint Status Report by September 7, 2022 [Clerk’s Dkt No. 143]. As part of the Joint Status Report, Plaintiffs are proposing to file a Second Amended Complaint by the later of September 29, 2022, or when the last named Plaintiff receives his/her Notice of Right to Sue from the EEOC. United’s current deadline to file its responsive pleading is September 8, 2022; however, given that Plaintiffs are amending their Complaint, the parties are jointly proposing that United wait to file its responsive pleading until after Plaintiffs have amended their Complaint. *See* Joint Report at 6(b).

Here, good cause exists for allowing United to extend the deadline to submit its first responsive pleading to Plaintiffs’ Amended Complaint until thirty (30) days after the Second

Amended Complaint is filed. Indeed, it would be inefficient to proceed in any other manner, as well as inconsistent with the terms jointly proposed by the parties in response to the Court's August 22 directive.

For these reasons, United requests that this Court extend the deadline for United to file its responsive pleading until thirty (30) days after Plaintiffs have amended their Complaint.

Respectfully submitted,

/s/ Russell D. Cawyer

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ATTORNEYS FOR UNITED AIRLINES, INC.

CERTIFICATE OF CONFERENCE

On September 6, 2022, I conferred with John Sullivan, counsel for the Plaintiffs concerning the relief requested in this Motion and Mr. Sullivan advised that the Plaintiffs were not opposed to the relief requested herein.

/s/ Russell D. Cawyer
Russell D. Cawyer

CERTIFICATE OF SERVICE

On September 7, 2022, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

/s/ Russell D. Cawyer
Russell D. Cawyer